

Gap Inc.

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February 12, 2002

Mr. William Caton
Acting Secretary
Federal Communications Commission
445 12th Street, S.W.

Washington, D.C. 20554

Re: NPRM No.: ET Docket 01-278)

Dear Mr. Caton:

Gap, Inc. supports the proposed recommendations regarding Part 2 & 15 changes and RFID mask changes affecting 13.56 MHz & 433 MHz frequencies in the NPRM.

We are actively involved in RFID products and applications where the users can benefit from this NPRM request. These applications do benefit Gap in its Retail Supply Chain optimization efforts. 13.56 MHz frequency is well established for RFID in credit card industry in "Contact less SmartCards".

As the principal systems developer and integrator for RFID systems with Gap, Inc., I support the proposed changes in section 15.225 of FCC Rules, 47 C.F.R. § 15.225 to allow RFID interrogators operating at 13.56 MHz to transmit data more effectively over longer localized ranges. It would harmonize the regulations and equipment performance with Europe (adopted by 43 CEPT countries), Australia and Canada.

The 13.56 MHz technology has been standardized. One global product version (based on regulations) is greatly desired. This regulation change does allow higher security, data transfer and read range performance.

Sincerely,

Glenn A Namian

Glenn A. Namian
Gap, Inc.
Lead Software Developer/Engineer
RFID Systems